

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

PETER XIE (01)

§
§
§
§
§

No. 4:20-CR-69

Judge Jordan

FACTUAL BASIS

It is hereby stipulated and agreed by Defendant **Peter Xie (Xie)** that the following facts are true and correct:

1. On or about August 6, 2018, in the Eastern District of Texas, **Xie** attempted to ship two elephant (Elephantidae) ivory snuff bottles, each in its own separate package, and each addressed to separate locations in the Republic of China.

2. Both packages were falsely labeled to describe their contents as “glass snuff bottle” and “snuff bottle” respectively, and they listed a fraudulent individual, to-wit: “Jason Yun” as the shipper and a fraudulent address, to-wit: “1528 Vera Cruz Drive Plano, TX 75704” as the shipper’s address, in violation of 16 U.S.C. § 3372(d)(2).

3. **Xie**, in the exercise of due care, should have known that federal law prohibits the creation of a false label for any wildlife intended to be transported in foreign commerce.


4. Additionally, **Xie** attempted to ship said packages when neither package contained the documentation required by the Convention of International Trade in

Endangered Species of Wild Fauna and Flora (CITES) and Title 50 CFR, Section 23.1(a)
in violation of 16 U.S.C. §§1538(c)(1) and 1540(b)(1).

SIGNATURE AND ACKNOWLEDGMENT BY DEFENDANT

I have read this Factual Basis and have discussed it with my attorney. I fully understand the contents of this Factual Basis and agree without reservation that it accurately describes my acts.

Dated: 2/3/2020




PETER XIE
Defendant

SIGNATURE AND ACKNOWLEDGMENT BY ATTORNEY FOR DEFENDANT

I have read this Factual Basis and the Information and have reviewed them with my client. Based upon my discussions with my client, I am satisfied that my client fully understands the Factual Basis.

Dated: 2/3/20



JOSHUA S. MILAM
Attorney for Defendant